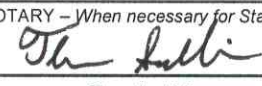
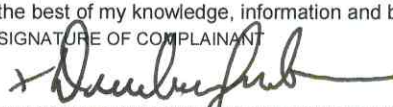



EXHIBIT K

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) ms. Delaney Yonchek		Home Phone (Incl. Area Code) 484-919-0278	Date of Birth 11-24-1994
Street Address City, State and ZIP Code 107 Drummers Lane Wayne, PA 19087			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Middle East Forum		No. Employees, Members 25	Phone No. (Include Area Code) 215-546-5406
Street Address City, State and ZIP Code 1650 Market Street Philadelphia, PA 19103 Suite 3600			
Name Gregg Roman, Daniel Pipes, Matthew Bennett		No. Employees, Members 25	Phone No. (Include Area Code) 215-546-5406
Street Address City, State and ZIP Code 1650 Market Street Philadelphia, PA 19103 Suite 3600			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest October 2017 - Present <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): Charging Party, Delaney Yonchek ("Charging Party") was subjected to discrimination and harassment by Respondents, Middle East Forum, Gregg Roman, Daniel Pipes, and Matt Bennett (collectively "Respondents") based upon Charging Party's sex and gender. The discrimination and harassment to which Charging Party was subjected was severe and pervasive and created a hostile work environment. Charging Party's supervisors were Gregg Roman, Daniel Pipes, and Matt Bennett. During Charging Party's employment, Respondents, including Respondent, Gregg Roman, subjected Charging Party to discrimination and harassment by cursing, yelling, screaming, shouting, insulting, belittling, disparaging, and verbally abusing female staff including Charging Party, Delaney Yonchek. Charging Party, Delaney Yonchek reported Respondent, Gregg Roman's severe and pervasive discrimination and harassment and was thus subjected to retaliation. Respondent, Gregg Roman created a hostile work environment and then enforced policies whereby Charging Party and the other female staff were denied the ability to report the severe and pervasive discrimination and harassment in the workplace. Respondent, Gregg Roman initiated, implemented and enforced a policy whereby female staff members were not allowed to interact with the President of the Middle East Forum, Daniel Pipes. Respondent, Gregg Roman actively and willfully worked to subjugate female employees of the Middle East Forum through policies designed to impede, obstruct, and prevent female employees from vindicating their right pursuant to Title VII of the Civil Rights Act. Respondent, Gregg Roman ordered female employees including Charging Party never to speak directly with President, Daniel Pipes. In November 2018, Charging Party, Delaney Yonchek notified and reported Respondent, Gregg Roman's discrimination and harassment of the female staff during a meeting with Respondent, Daniel Pipes when almost every female employee of the Middle East Forum came forward together to report the severe and pervasive discrimination and harassment to which female staff were subjected by Respondent, Gregg Roman.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements 	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Date 6/13/19		Charging Party Signature 	
Date 6/13/19		Commonwealth of Pennsylvania - Notary Seal THOMAS SULLIVAN, Notary Public Philadelphia County My Commission Expires March 11, 2023 Commission Number 1347443	

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC

Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):


The female staff reported Respondent, Greg Roman's harassment, bullying, and his intolerable, onerous, and abusive conduct and comments designed to discriminate against female employees of the Middle East Forum. Those present at the November 9, 2018 meeting when the female staff held a group meeting with Respondent, Daniel Pipes to report Respondent, Greg Roman's discrimination and harassment in the workplace, included: Patricia McNulty, Lisa Barbounis, Caitriona Brady, Respondent, Matt Bennett, Stacy Roman, Thelma Prosser, Marnie Meyer, Mark Fink, Respondent, Daniel Pipes, and Charging Party, Delaney Yonchek. Stacy Roman is Respondent, Greg Roman's sister. Her presence at a meeting held to report and begin investigation into Respondent, Greg Roman's discrimination and harassment in the workplace is indicative of Respondents' utter and total disregard for the anti-discriminatory intent promulgated by Title VII. Throughout the entire meeting, while the female staff who were subjected to severe and pervasive discrimination and harassment in the workplace attempted to report Respondent, Greg Roman's unlawful conduct, Respondent, Greg Roman's sister, Stacy Roman was belligerent and interjected argumentative comments. For example, Stacy Roman blamed the women who were subjected to discrimination and harassment based upon their sex and gender stating that they should not have worn such short skirts. Notwithstanding, Respondent, Daniel Pipes and house counsel, Mark Fink refused to ask Stacy Roman to leave in order to provide the female staff who were subjected to discrimination and harassment with a safe environment in which to make their reports. Moreover, Daniel Pipes actually invited Respondent, Greg Roman to the meeting, although he did not attend. Respondent, Daniel Pipes coerced the female staff to sign nondisclosure agreements ("NDA") in order to attend. Respondent, Daniel Pipes would not allow the female staff including Charging Party, Delaney Yonchek to report discrimination and harassment in the workplace until she signed an NDA. Respondent, Greg Roman set up cameras around the office and harassed the female staff by monitoring everything they did, including Charging Party, Delaney Yonchek. These cameras are still operational today and Respondent, Greg Roman continues to harass the female staff using surveillance equipment. Respondent, Greg Roman used the surveillance equipment to monitor female staff and how often and how long they used the bathroom. Respondent, Greg Roman's made certain that female staff knew they were being watched in an effort designed to harass, scare, intimidate, and alarm female staff including Charging Party, Delaney. Respondent, Greg Roman told female employees how many times they used the restroom in a given day. For example, he would say, Delaney used the bathroom five (5) times today. Respondent, Greg Roman actively attempted to have sexual relations with interns. Due to this information and Respondent, Greg Roman's history of discrimination and harassment, female staff including Charging Party are afraid to be alone with Respondent Greg Roman. Charging Party sent text messages to Respondent Matt Bennett notifying Respondent, Matt Bennett that she was afraid to be alone with Respondent, Greg Roman. Respondent, Matt Bennett refused to conduct an investigation. No corrective action was taken. Respondent, Greg Roman forced female employees to sit next to him at his desk, instead of across from him. Respondent, Greg Roman got inappropriately close to the female staff including Charging Party, Delaney Yonchek. Respondent, Greg Roman forced female staff to sit with him and watch inappropriate videos. Respondent, Greg Roman continued to divulge inappropriate sexual information to female staff. For example, Respondent, Greg Roman spoke about his girlfriend giving him blowjobs. Respondent, Greg Roman gave \$1,200.00 to an intern named Gabrielle Bloom in a quid pro quo sexual exchange. Respondent, Greg Roman started inappropriate sexual rumors involving staff members including the employee who Charging Party worked with, Caitriona Brady. Respondent, Greg Roman informed people in the office that Caitriona Brady's father was having a sexual affair with another staff member. Respondent, Daniel Pipes also maintained sexual relationships with employees including an employee named Brook Goldstein. At present, Charging Party is subjected to a severe and pervasive atmosphere of discrimination and harassment based upon her sex and gender and in retaliation for Charging Party's reports and opposition to discrimination and harassment. Charging Party continues her attempts to report and obtain assistance from Respondent, Daniel Pipes. Respondent, Daniel Pipes continues to protect, shield, indemnify and assist Respondent, Greg Roman from any and all impact caused by his severe and pervasive discrimination and harassment. Accordingly, Respondent, Daniel Pipes has condoned, sanctioned, permitted, and allowed the discrimination, harassment, and retaliation to continue. Respondents have made Charging Party's working conditions so onerous, abusive, and intolerable that no person in Charging Party's shoes should be expected to continue working under such conditions. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed. As a result of Respondents' conduct, Charging Party was caused to sustain serious and permanent personal injuries, including permanent psychological injuries. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed. As a result of the acts and conduct complained of herein, Charging Party has suffered and will continue to suffer a loss of income, loss of salary, bonuses, benefits and other compensation to which such employment entailed. Charging Party also suffered future pecuniary losses, emotional pain, humiliation, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Charging Party has further experienced severe emotional and physical distress. As Respondents' conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law, Charging Party demands Punitive Damages as against all the Respondents, jointly and severally. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation. At all times material Respondents refused to investigate or take appropriate remedial action in response to Charging Party's complaints of discrimination, harassment and hostile work environment. Respondents discriminatory conduct was severe and pervasive, and created a hostile work environment for Charging Party. The above are just some examples of some of the discrimination and retaliation to which Respondents subjected Charging Party. Charging Party claims a pattern and practice of discrimination, claims continuing violations, and makes all claims herein under the continuing violations doctrine. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

6/13/19

Date



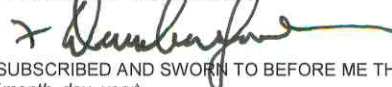
Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements



I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT



SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

6/13/19

Commonwealth of Pennsylvania - Notary Seal
 THOMAS SULLIVAN, Notary Public
 Philadelphia County
 My Commission Expires March 11, 2023
 Commission Number 1347443

**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Delaney Yondick v. Middle East Forum

EEOC Charge Number: _____

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

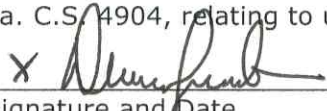
Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

SIGN AND DATE APPROPRIATE REQUEST BELOW

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X 
Signature and Date

OR

I do not want my charge dual filed with PHRC.

Signature and Date

DEREK SMITH LAW GROUP, PLLC

By: Seth D. Carson

ID: 319886

1845 Walnut Street, Suite 1600

Philadelphia, PA 1910

Phone: 215.391.4790

Facsimile: 215.893.5288

Email: seth@dereksmithlaw.com

ATTORNEY FOR CHARGING PARTY

DERELANEY YONCHEK	:	EQUAL EMPLOYMENT
107 Drimmers Lane	:	OPPORTUNITY COMMISSION
Wayne, PA 19087	:	
	:	
Charging Party	:	June 20, 2019
vs.	:	
	:	
MIDDLE EAST FORUM	:	TO BE DUAL FILED WITH THE
1650 Market Street, Suite 3600	:	
Philadelphia, PA 19103	:	
and	:	PENNSYLVANIA HUMAN
DANIEL PIPES (individually)	:	RELATIONS COMMISSION
and	:	
GREG ROMAN (individually)	:	AND
and	:	
MATTHEW BENNETT (individually)	:	PHILADELPHIA COMMISSION
	:	ON HUMAN RELATIONS
Respondents.	:	

ENTRY OF APPEARANCE

Kindly enter the appearance of Seth D. Carson, Esquire, on behalf of Charging Party,
DERELANEY YONCHEK, in the above listed matter.

DEREK SMITH LAW GROUP, PLLC,

/s/ Seth D. Carson
SETH D. CARSON, ESQUIRE

DATED: June 20, 2019